

**PACIFIC GAS AND ELECTRIC COMPANY
Wildfire Mitigation Plans Discovery 2022
Data Response**

PG&E Data Request No.:	WilliamBAbrams_002-Q05		
PG&E File Name:	WMP-Discovery2022_DR_WilliamBAbrams_002-Q05		
Request Date:	April 13, 2022	Requester DR No.:	Email Transmittal – 2022WMP DR-02
Date Sent:	April 25, 2022	Requesting Party:	William B. Abrams
PG&E Witness:		Requester:	Will Abrams

**SUBJECT: PG&E WMP GAP ANALYSIS GIVEN KINCADE FIRE TESTIMONY AND
SAFETY IMPLICATIONS**

Expert Testimony: Mr. Gary Uboldi, Fire Captain Specialist Peace Officer with the California Department of Forestry and Fire Protection who has investigated over 400 wildfires across his 20+ year career

Testimony Date: February 8, 2022 (See Attachment A: Pre-Trial Transcript)

BACKGROUND TESTIMONY/EVIDENCE:

Pg. 81 (line 1-2, 13-18)

“We know that the wire was down for a while because due to oxidization and weathering... And weathering, oxidization, when we did pick it up there was nesting where it had been laying in the mud, and there was like a form built in the mud. So, it had been there for a significant time, at least through several rains.”

QUESTION 05

What operational practices and QA has PG&E incorporated into their risk mitigation to ensure old wires are not left abandoned on the ground around infrastructure?

ANSWER 05

There is no evidence or suggestion that a piece of old wire on the ground contributed to the Kincade Fire or created any wildfire risk. As the witness testified, the piece of wire was significant only because the condition of the wire after the fire burned over and around it “show[ed] a lot of fire pattern indicators” that allowed the witness to determine how the fire spread after ignition. (Tr. 80:23-81:6.)

The issue of old pieces of wire lying on the ground is not addressed in the WMP because it is generally irrelevant to wildfire prevention. However, PG&E employees (and contractors) should ensure jobsites are clean and excess materials are picked up upon completion of maintenance and construction projects.